

1. The State of Illinois amended the Wood Furniture Coating Rules effective February 2, 1998. 22 Ill. Reg. 3556. On March 6, 1998, the State of Illinois submitted the amended Rules to U.S. EPA as a requested revision of the Illinois SIP for ozone. On May 19, 1998, U.S. EPA approved the Illinois SIP revision, making the amended Wood Furniture Coating Rules federally enforceable, effective July 20, 1998. 63 Fed. Reg. 27489.
2. 35 Ill. Admin. Code, Part 218.204 (1)(2)(B)(i) sets forth the emission limitations for wood furniture coaters, specifying that no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the emission limitations for the specified coating. On and after March 15, 1998, wood furniture sealers and topcoats must comply with the emission limitation of 1.9 lb VOM/lb solid for an acid-cured alkyd amino vinyl sealer.

**Factual Background**


3. FCI owns and operates a wood office furniture manufacturing facility located at 1750 North Lawndale Avenue, Chicago, Illinois, which includes a coating line. FCI, Inc., is located in Cook County, Illinois.
4. FCI applied 1,884 gallons of a non-acid cured vinyl sealer, at its Chicago facility between December 1, 1998 and May 31, 1999.
5. The non-acid cured vinyl sealer has a VOM content of 2.97 lb VOM/lbs of solid.
6. By applying the non-acid amino vinyl sealer, as described herein, FCI used a coating that contained more than 1.9 lb VOM/lb solid on various dates between December 1, 1998 and May 31, 1999.

**Finding of Violation**

7. FCI's use of the non-acid cured alkyd amino vinyl sealer between December 1, 1998 and May 31, 1999 is a violation of the emission limitations for wood furniture coaters at 35 Ill. Admin. Code 218.204.

Z-10-00

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Date

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Bharat Mathur, Director  
Air and Radiation Division

**CERTIFICATE OF MAILING**

I, Betty Williams, certify that I sent a Notice of Violation, issued pursuant to the Clean Air Act, by Certified Mail, Return Receipt Requested, to:


Paul Bartolomei, Vice President  
FCI, Inc.  
1750 N. Lawndale Avenue  
Chicago, Illinois 60647

I also certify that I sent copies of the Notice of Violation by first class mail to:

Harish Narayen, Acting Regional Manager  
Environmental Control  
Illinois Environmental Protection Agency, Region 1  
1701 S. First Avenue  
Maywood, Illinois 60153

David Kolaz, Manager  
Compliance and Systems Management Section  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62702

on the 10<sup>th</sup> day of February, 2000.

  
Betty Williams, Secretary  
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 2199026386